

# EXHIBIT 5



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## Greenflight Venture Corporation v. Google LLC, No. 24-80395 (S.D. Florida)

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**Keith Mathews** <Keith@awplegal.com>

Mon, Aug 26, 2024 at 5:44 AM

To: "Mullins, Edward M. (MIA)" <EMullins@reedsmith.com>, Matt Warren <matt@warrenkashwarren.com>, Ayelet Faerman <ayelet@faerman.law>, "Barton, Ana M." <ABarton@reedsmith.com>, "Herrera, Sujey S." <SHerrera@reedsmith.com>, "Jeffrey D. Isaacs" <jeffrey.isaacs.wg03@wharton.upenn.edu>  
Cc: "Greenflight Venture Corporation v. Google LLC" <24-80395@cases.warrenlex.com>

Hi Ed,

I have not heard back from you about either the use of Slack for discovery organization (or Google Chat, or similar tool you may propose). I have also not heard back about the deposition noticed by Isaacs, which covers largely the same issues requested in the now 8 month old subpoena request. Because there was an obligation of Wilson Sonsoni to investigate and preserve these matters 18 months ago, and again 8 months ago, this should be a simple deposition.

My understanding of the Courts' order is that Isaacs pro se claims will be covered by my representation of Greenflight, hence I plan to take over the lead of this deposition. I do not represent Isaacs, to be clear, but my advocacy for Greenflight permits my attendance at the deposition, which would now be lead, given the COurt's order.

As Isaacs originally noticed, we are amenable to video deposition. Please provide your availability and and suggested video deposition vendors, otherwise, I have some I can arrange. Given the imminent timing, your prompt response is appreciated.

While I note that you indicated in the Joint Report that you will not comply with Isaacs' discovery requests, our position is that you have not obtained any leave for relief from the discovery, and therefore I expect you to comply with all outstanding discovery requests, especially as you had 18 months to prepare for this with Wilson Sonsoni.

Thanks,

Keith

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**From:** Mullins, Edward M. (MIA) <EMullins@reedsmith.com>

**Sent:** Thursday, August 22, 2024 7:06:09 PM

**To:** Matt Warren <matt@warrenkashwarren.com>; Keith Mathews <Keith@awplegal.com>; Ayelet Faerman <ayelet@faerman.law>; Barton, Ana M. <ABarton@reedsmith.com>; Herrera, Sujey S. <SHerrera@reedsmith.com>

**Cc:** Greenflight Venture Corporation v. Google LLC <24-80395@cases.warrenlex.com>

**Subject:** RE: Greenflight Venture Corporation v. Google LLC, No. 24-80395 (S.D. Florida)

Here it is

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**From:** Matt Warren <matt@warrenkashwarren.com>

**Sent:** Thursday, August 22, 2024 6:53 PM

**To:** Keith Mathews <keith@awplegal.com>; Ayelet Faerman <ayelet@faerman.law>; Mullins, Edward M. (MIA) <EMullins@reedsmith.com>; Barton, Ana M. <ABarton@reedsmith.com>; Herrera, Sujey S. <SHerrera@reedsmith.com>

**Cc:** Greenflight Venture Corporation v. Google LLC <24-80395@cases.warrenlex.com>

**Subject:** Greenflight Venture Corporation v. Google LLC, No. 24-80395 (S.D. Florida)

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External E-Mail - FROM [matt@warrenkashwarren.com](mailto:matt@warrenkashwarren.com) <matt@warrenkashwarren.com>

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On Thu, Aug 22, 2024 at 3:48 PM Keith Mathews <[Keith@awplegal.com](mailto:Keith@awplegal.com)> wrote:

I'm not at a computer so I have no other ways to attach documents. The changes are in bold. Are you unable to access the link? I sent the exhibits the same way earlier.

Your email notes that you're using Outlook for iOS; it can attach documents. The links are not working for me. Please send attachments, which is the industry standard mechanism for communication between counsel.

Best Regards,

Matt Warren

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Matt Warren [matt@warrenkashwarren.com](mailto:matt@warrenkashwarren.com) +1 (415) 895-2928

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